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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2010-373**

12 **SANDRA C. TAYLOR, A.K.A.**
13 **SANDRA CORRINE TAYLOR MANNING**
14 **P.O. Box 434**
Marietta, Oklahoma 73448
Registered Nurse License No. 446731

A C C U S A T I O N

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 **Registered Nurse License**

23 2. On or about September 30, 1989, the Board issued Registered Nurse License Number
24 446731 to Sandra C. Taylor, also known as Sandra Corrine Taylor Manning ("Respondent"). The
25 registered nurse license was in full force and effect at all times relevant to the charges brought
26 herein and expired on June 30, 2009.

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STATUTORY PROVISIONS

3. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

5. Code section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

(b) Procuring his or her certificate or license by fraud, misrepresentation, or mistake.

(e) Making or giving any false statement or information in connection with the application for issuance of a certificate or license.

(f) Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof.

COST RECOVERY

6. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Out-of-State Discipline)**

3 7. Respondent is subject to disciplinary action pursuant to Code section 2761,
4 subdivision (a)(4), on the grounds of unprofessional conduct, in that Respondent has been
5 disciplined by the State of Oklahoma, State of Texas, and the State of Idaho, as follows:

6 **Oklahoma Board of Nursing**

7 a. On November 7, 2007, a nurse investigator of the Oklahoma Board of Nursing
8 ("Oklahoma Board") filed a complaint against Respondent alleging facts which constitute a
9 violation of the Oklahoma Nursing Practice Act.

10 b. On November 14, 2007, the Oklahoma Board filed an Order for Emergency
11 Temporary Suspending Pending a Hearing.

12 c. On November 30, 2007, the Oklahoma Board received Respondent's Response and
13 Notice of Appearance in which she admitted to all the allegations of the complaint.

14 d. On January 8, 2008, the Oklahoma Board of Nursing ("Oklahoma Board") adjudged
15 Respondent to be in default following Respondent's failure to appear at the hearing scheduled on
16 that date. Pursuant to the Order of Revocation by Default, the Oklahoma Board ordered
17 Respondent's Oklahoma Nursing License No. R0051161 revoked for a period of fifty (50) years.
18 It was further ordered that Respondent may never apply for a nursing license in the State of
19 Oklahoma. It was further ordered that within thirty (30) days of receipt of the Order, Respondent
20 was to reimburse the Oklahoma Board an administrative penalty in the amount of \$14,000 and the
21 amount of \$4,100 for actual investigation and prosecution costs. The basis for discipline is as
22 follows:

23 i. On or about November 13, 1986, the Board of Nursing in the State of Idaho
24 issued an Order against Respondent, revoking her Practical Nurse License No. PN-3812, for gross
25 negligence in performing nursing functions and violation of standards of conduct and practice.

26 ii. On or about June 24, 1982, Respondent pled guilty to a felony, Obtaining
27 Welfare Benefits by Fraudulent Acts, in the District Court of the Second Judicial District of the
28 State of Idaho, in and for the County of Nez Perce, Case No. 49095, in the matter entitled

1 *The State of Idaho vs. Sandra C. Taylor*, Case No. 49095. Respondent was placed on probation
2 for five (5) years with conditions, under the custody of the Board of Correction and the District
3 Court. Respondent was further ordered to pay restitution in the amount of \$2,163.30.

4 iii On or about April 30, 1986, Respondent applied in the State of Washington to
5 take the NCLEX-RN exam answering "No" to the question which asked if she had a felony or
6 misdemeanor violation. Further, Respondent indicated in that application that she had completed
7 her nursing education at Lewis Clark State College, Lewiston, Idaho in 1986 and had graduated
8 with an Associate Degree; however, that college has no record of Respondent ever being enrolled
9 as student.

10 iv. On or about February 19, 1988, the Board of Nursing for the State of Idaho
11 denied Respondent a license to practice as a registered nurse based on her revocation as a
12 practical nurse in that state, as more particularly set forth in subparagraph i, above,

13 v. On or about January 3, 1990, Respondent filed an Application for Endorsement
14 as a Registered Nurse with the Oklahoma Board of Nursing wherein she attested that she
15 graduated from Lewis Clark State College in Lewiston, Idaho with an Associate Degree in May
16 1986; however, that facility has no record of Respondent ever attending that college.

17 vi On or about June 13, 2000, the Board of Nurse Examiners for the State of
18 Texas ("Texas Board") issued an Order against Respondent revoking Respondent's Texas
19 Permanent Certificate No. 549419. The Texas Board concluded that Respondent engaged in
20 conduct likely to injure patients, place patients in harm, and deceived her employer and the public
21 by documenting incorrect information about her educational background.

22 vii On or about March 12, 2004, Respondent renewed her Oklahoma registered
23 nurse license with the Oklahoma Board and falsified her renewal form by answering "No" to
24 Question No. 3, which asked if she ever received a deferred sentence, including expunged
25 offenses and "No" to Question No. 4, which asked if disciplinary action had been taken against
26 her nursing license or any other health care license in Oklahoma or any other state.

27 viii On or about August 14, 2006, Respondent filed an Application for
28 Reinstatement of License with the Oklahoma Board and falsified her application by answering

1 "No" to Question No. 6, which asked if she had ever been convicted of a felony and "No" to
2 Question No. 7, which asked if she had ever had disciplinary action taken against her nursing
3 license or on any health-related license or certificate in any state, territory or country.

4 ix On or about March 30, 2006, through June 14, 2007, Respondent, while
5 employed with Jetty Counseling Center in Wynnewood, Oklahoma, performed out-patient
6 clinical services (psychotherapy and treatment planning services) as a mental health professional
7 for SoonCare patients and signed her name as "S. Taylor, RN, MSN, AAPN" when, in fact, she
8 failed to provide any documents indicating she has been certified as an Advanced Practice Nurse.
9 Further, Respondent failed to provide any documentation authenticating she had a Master's
10 Degree in nursing.

11 **Board of Nurse Examiners for the State of Texas**

12 e. Effective June 13, 2000, the Board of Nurse Examiners for the State of Texas ("Texas
13 Board") pursuant to the Order of the Board, dated the same, revoked Respondent's Permanent
14 Certificate Number 549419, to practice professional nursing in the State of Texas. The basis for
15 discipline is as follows:

16 i. On January 10, 1997, while employed with Contract Management Services,
17 Inc., ("CMSI") and working at Baylor University Medical Center, Dallas, Texas, Respondent
18 failed to administer, in a timely fashion, Kayexelate, as ordered by the physician for Medical
19 Record #100413-006, a patient in renal failure. Further, on the same date, Respondent failed to
20 document the medications administered and care given to the same patient.

21 ii. On February 5, 1997, while employed by CMSI and working at Baylor
22 University Medical Center, Dallas, Texas, Respondent failed to care adequately for the Swan
23 Ganz catheter for Medical Record #473026-001. The ventral venous pressure port of the catheter
24 was found to be open and leaking blood. It was determined that the Swan Ganz was inoperable
25 and another Swan Ganz should not be inserted due to the high risk associated with the patient's
26 condition. Further, on the same date, regarding this patient, Respondent discontinued a drip
27 infusion of Cardizem instead of the Procainamide infusion as ordered by the patient's physician.

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1 iii. On July 5, 1989, while seeking employment with CMSI, Respondent falsified
2 her application for employment by providing incorrect information about her educational
3 background.

4 iv. On September 30, 1995, while seeking employment with CMSI, Respondent
5 falsified her application for employment by providing incorrect information about her educational
6 background.

7 **Board of Nursing, State of Idaho**

8 f. Effective November 13, 1986, the Board of Nursing, State of Idaho ("Idaho Board")
9 pursuant to the Order Revoking License, dated the same, revoked Respondent's Practical Nurse
10 License Number PN-3812, to practice professional nursing in the State of Idaho. The basis for
11 discipline is as follows:

12 i. On June 9, 1986, the Idaho Board initiated a Petition for Revocation or
13 Suspension of License and served on Respondent on July 21, 1986. On August 6, 1986 in
14 response to the petition, Respondent mailed a ten-page letter to the Idaho Board; however,
15 Respondent failed to return the Answer to Petition nor did she request a hearing.

16 ii. On April 6, 1982, Respondent signed a notarized statement that on March 14,
17 1982, Respondent inadvertently disposed of a contaminated multi-dose vial of Morphine Sulfate
18 with approximately 14 cc remaining by pouring the drug down the sink drain instead of returning
19 the unused portion to the pharmacy.

20 iii. From on or about January 1982, to February 1983, nursing assistants reported
21 to Board staff that they witnessed Respondent frequently yelling loudly at residents in the
22 Lewiston Care Center, that she used obscene language in the presence of residents, that several
23 times she moved residents so roughly that their extremities hit the side rails, causing bruising and
24 breaking of the skin, and that on one occasion when a resident was yelling loudly, Respondent
25 covered the resident's face purposefully with soiled linen. Further, on at least one occasion,
26 Respondent fondled the genitals of a male resident.

27 iv. From on or about June 22, 1983, and July 7, 1983, Respondent frequently left
28 the medication cart and the medication room door unlocked.

1 v. In or about February 1984, Respondent was terminated from St. Joseph's
2 Hospital for failure to provide nursing care that met minimum standards, as follows:

3 A. In or about April 1983, Respondent documented evening care that had not
4 been provided.

5 B. In or about December 1983, Respondent mixed and hung two medicated
6 intravenous solutions, which acts exceeded the scope of practice.

7 C. In or about December 1983, Respondent inserted a dirty nasogastric tube
8 that was misplaced into the patient's lung.

9 D. In or about February 1984, Respondent failed to administer two or three
10 hourly tube feedings to a patient as ordered by a physician.

11 vi. On or about April 6-7, 1986, Respondent failed to respond to three reports from
12 nursing assistants on the 3-11 and 11-7 shifts of complaints of pain from a patient at Orchard
13 Nursing Home, Lewiston, Idaho. The patient was found on the floor after having been placed in a
14 geriatric chair. Further, Respondent failed to conduct further assessments and contact the
15 physician to report the complaints or obtain a pain medication order. Respondent documented the
16 record "no complaints"; however, the following day the patient was diagnosed as having a
17 fracture that required surgical intervention.

18 **SECOND CAUSE FOR DISCIPLINE**

19 **(Obtained Licenses by Fraud or Misrepresentation)**

20 8. Respondent is subject to disciplinary action pursuant to Code section 2761,
21 subdivision (b), in that Respondent obtained licensure in the State of Washington and the State of
22 Oklahoma by fraud or misrepresentation, as follows:

23 a. Respondent falsely represented her educational background on both applications for
24 licensure that she graduated from Lewis Clark State College, Lewiston, Idaho; however, that
25 institution has no record that Respondent was ever enrolled as a student.

26 b. Respondent falsely represented on both applications for licensure that she had not
27 been convicted of a felony or misdemeanor; however, Respondent had been convicted of a
28 felony, as more particularly set forth in paragraph 7, subparagraph (d)(ii), above.

1 THIRD CAUSE FOR DISCIPLINE

2 (Providing False Information on Applications for Licensure)

3 9. Respondent is subject to disciplinary action pursuant to Code section 2761,
4 subdivision (e), in that Respondent provided false information to the State of Washington and the
5 State of Oklahoma on her applications for licensure, as more particularly set forth in paragraph 8,
6 subparagraphs a and b, above.

7 FOURTH CAUSE FOR DISCIPLINE

8 (Conviction of a Crime)

9 10. Respondent is subject to disciplinary action pursuant to Code section 2761,
10 subdivision (f), in that on June 24, 1982, in the District Court of the Second Judicial District of
11 the State of Idaho, County of Nez Perce, in the matter entitled *The State of Idaho vs. Sandra C.*
12 *Taylor*, Case No. 49095, Respondent was convicted following her plea of guilty to a violation of
13 I.C. 56-227, (obtaining welfare benefits by fraudulent acts), a felony. Respondent was placed on
14 probation for 5 years with conditions.

15 PRAYER

16 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
17 and that following the hearing, the Board of Registered Nursing issue a decision:

18 1. Revoking or suspending Registered Nurse License Number 446731, issued to Sandra
19 C. Taylor, also known as Sandra Corrine Taylor Manning;

20 2. Ordering Sandra C. Taylor, also known as Sandra Corrine Taylor Manning to pay the
21 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this
22 case, pursuant to Business and Professions Code section 125.3; and,

23 3. Taking such other and further action as deemed necessary and proper.

24 DATED: 2/4/10

25 *Louise R. Bailey*
LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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